

Attorney for Plaintiff  
NEVADA TITLE COMPANY

## UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

NEVADA TITLE COMPANY, a Nevada corporation,

Plaintiff,

VS.

ACE AMERICAN INSURANCE COMPANY, a  
Pennsylvania corporation,

Defendant.

ACE AMERICAN INSURANCE COMPANY, a  
Pennsylvania corporation,

Counter-Complainant,

VS.

NEVADA TITLE COMPANY, a Nevada corporation,

Counter-Defendant.

Plaintiff and Counter-defendant, NEVADA TITLE COMPANY, (“NTC”) by its counsel, Steven J. Parsons, of LAW OFFICES OF STEVEN J. PARSONS, and Defendant and Counter-claimant, ACE AMERICAN INSURANCE COMPANY, (“ACE American”) by its counsel Richard C. Mason, of COZEN O’CONNOR, hereby stipulate and agree that NTC shall have to and including Monday, March 25, 2019 to respond to ACE American’s Motion to Modify Scheduling Order (Doc. No. 31).

Case No. 2:18-cv-1823-GMN-(VCF)

THE PARTIES STIPULATION and  
(PROPOSED) ORDER  
TO ENLARGE TIME FOR PLAINTIFF and  
COUNTER-DEFENDANT TO RESPOND TO  
DEFENDANT and COUNTER-CLAIMANT'S  
MOTION TO MODIFY SCHEDULING ORDER  
TO PHASE DISCOVERY AND SCHEDULE  
DISPOSITIVE MOTIONS ON CLAIMS  
RELATING TO NTC'S PRIOR KNOWLEDGE  
(Doc No. 31)  
(First Request)

1 This Stipulation between the parties to allow NTC an additional time to respond to the  
2 Motion to Modify Scheduling Order is the first request. Plaintiff needs additional due diligence,  
3 upon the preparation of Plaintiff's responses to the written discovery requests from  
4 Defendant. This stipulation is not posed simply for the purposes of delay.

5 Dated: Friday, March 8, 2019.

6 LAW OFFICES OF STEVEN J. PARSONS

COZEN O'CONNOR

7 /s/ Steven J. Parsons  
STEVEN J. PARSONS  
8 Nevada Bar No. 363

/s/ Richard C. Mason  
RICHARD C. MASON

9 Attorney for Plaintiff and Counter-  
defendant NEVADA TITLE COMPANY

Attorney for Defendant and Counter-  
claimant  
ACE AMERICAN INSURANCE COMPANY

11 ORDER

12 IT IS SO ORDERED.

13 Dated: 3-11-2019  
Dated: \_\_\_\_\_.

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15 U.S. MAGISTRATE JUDGE  
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